

Response to TAC Comments on the PCB Monitoring Guidance September 18th, 2008

Dated 10/27/08

Introduction

Guidance is needed to promote polychlorinated biphenyl (PCB) monitoring in support of VADEQ's TMDL program. A Technical Advisory Committee (TAC) was organized to assist in the development of this guidance. The fourth TAC meeting was held on September 18 (2008) at VADEQ's Piedmont Regional Office. Minutes of the meeting were distributed to TAC members on September 30 (2008).

Comments on the September 9th Draft of the PCB PS Monitoring Guidance were received from the Virginia Association of Municipal Wastewater Agencies, Inc. (VAMWA) and representatives of the Virginia Manufacturers Association (VMA). Their comments are provided below along with VADEQ's response.

Comments from VAMWA – October 2, 2008

Comment 1: – “Zero” Wasteload Allocations

VAMWA was concerned about the language regarding a wasteload allocation of zero for some sources.

Response: Based on discussion during the September 18th TAC meeting, this language has been changed as reflected in the Minutes of the meeting distributed to TAC members on September 30th.

Comment 2: – Storm Water and CSO

VAMWA stated it “...was unclear what, if any, analyses might be requested from MS4 systems, other permitted stormwater outfalls or CSO outfalls.” In addition, they recommended any data collected from these sources “...would reflect the general presence of PCBs in the environment, soils and impervious areas, and would not reflect a true source of PCBs. It is therefore not generally necessary or advantageous to obtain such data.” They concluded that “...sampling of storm water outfalls would provide no useful information as long as there was no identifiable prior PCB use or disposal activity on the site.”

Response: It was decided during the August 10th, 2007 *ad hoc* TAC call on Industrial storm water that this guidance was not intended for MS4 discharges since they were regulated by DCR. However, industrial stormwater or CSO outfalls discharging into impaired waters are being requested to monitor. While MS4 are not covered under this guidance, any voluntary monitoring of MS4 outfalls could be used in TMDL development if the collection and analysis was done in accordance with the Guidance.

VADEQ agrees that data generated from these systems may not reflect all sources of PCBs. However, monitoring is needed to meet the minimal EPA requirements regarding characterization of existing pollutant loadings under a TMDL (EPA 1992, 1999). This was noted during the September 18th TAC meeting and reflected in the minutes distributed to TAC members on September 30th.

Comment 3: – Additional Technical Issues

VAMWA provided comments to Appendix C, sections 4.4.1 and 5.1.1 and Appendix B (page 3 of 3).

Response: VADEQ agrees and changes have been made to Appendix C, section 4.4.1. The use of baked aluminum foil has been excluded. Appendix B of the guidance does not include waiver language since this is an example of a special condition negotiated with DEQ permitting staff.

Comment 4: - Sampling and Analysis

VAMWA recommends that once collected, the data should be allowed to serve multiple purposes.

Response: No change will be made to the guidance, since this issue deals with implementation and not TMDL development.

Other technical issues discussed following the September meeting between HRSD and VADEQ have been included in Appendices C and D.

Comments from VMA – October 3, 2008

Comment 1: – Total PCBs

VMA contends there is no guidance provided on determining Total PCBs from the EPA method 1668A.

Response: As stated in the guidance (Section V.C) “Individual congeners are summed to form total PCB.” Additional clarification regarding data qualifiers now included the use of “J”, “EMPC” and “U” in Appendix D-Attachment 3.

Comment 2: – Method and field blanks

VMA asks that an assessment of blank results be incorporated into the guidance.

Response: VADEQ agrees and changes have been made to Appendix D.

Comment 3: – Additional substantive comments

VMA offers editorial suggestions to clarify guidance language.

Response: VADEQ agrees and has incorporated these editorial changes.